IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: NATIONAL COLLEGIATE ATHLETIC ASSOCIATION STUDENT-ATHLETE CONCUSSION INJURY LITIGATION – SINGLE SPORT / SINGLE SCHOOL (FOOTBALL)	)	**MDL No. 2492**
	)	**Master Docket No. 1:16-cv-08727**
	)	**Judge John Z. Lee**
	)	**Magistrate Judge David M. Weisman**
	)	**This Document Relates to All Cases**

DEFENDANTS' DESIGNATION OF THREE (3) LEAD COUNSEL AND ONE (1) LIAISON COUNSEL

Defendants National Collegiate Athletic Association (the "NCAA"), et al. (collectively, "Defendants"), through their counsel, respectfully submit the following designation of three (3) Lead Counsel and one (1) Liaison Counsel. In support of this submission, Defendants state as follows:[1]

1. On September 8, 2016, the Court issued CMO 4. See CMO 4 (Dkt. #1). In CMO 4, the Court ordered Defendants to confer and seek consensus on the selection of two (2) candidates to serve as Lead Counsel for Defendants. See id. ¶ 12(b). The Court further ordered Defendants to confer and seek consensus on the selection of a candidate for the position of Liaison Counsel. See id. ¶ 11. Once agreement was reached on Lead Counsel and Liaison Counsel, Defendants were to file a designation with the Court by October 5, 2016. See id. ¶¶ 11, 12(b).

2. On October 5, 2016, the NCAA filed an Agreed Motion for Leave to Designate Three (3) Lead Counsel for Defendants and for an Extension of Time. See NCAA Agreed

[1] Unless otherwise defined, capitalized terms have the meaning ascribed to them in Case Management Order No. 4 ("CMO 4"). See CMO 4 (Dkt. #1).

Motion (Dkt. #23). In that motion, the NCAA requested leave to designate three (3) Lead Counsel instead of the two (2) specified in CMO 4 in order to "represent each of the three (3) categories of Defendants named in the Single Sport / Single School cases: (i) the NCAA; (ii) NCAA member schools; and (iii) the NCAA conferences."[2] Id. ¶ 5.

3. The motion filed by the NCAA tentatively identified three (3) Lead Counsel: (i) Mark S. Mester of Latham & Watkins for the NCAA; (ii) Matthew Kairis of Jones Day for the named NCAA member institutions; and (iii) Michael Olsen of Mayer Brown for the conferences named. See NCAA Agreed Motion (Dkt. #23) ¶ 6. The motion also listed one (1) Liaison Counsel for Defendants, namely Johanna Spellman of Latham & Watkins. See id. ¶ 6.

4. The motion filed by the NCAA further requested an extension of time for Defendants to finalize their selection of Lead Counsel. See NCAA Agreed Motion (Dkt. #23) ¶ 10.

5. On October 7, 2016, the Court granted the NCAA's request for an extension of time and entered and continued the NCAA's motion for leave to designate three (3) Lead Counsel. See Minute Entry (Dkt. #28).

6. After thorough consideration and subject to approval by the Court, Defendants have agreed to designate the three (3) Lead Counsel and the one (1) Liaison Counsel identified in the NCAA's earlier motion. See NCAA Agreed Motion (Dkt. #23) ¶ 6.

WHEREFORE, pursuant to CMO 4 and subject to the Court's approval of the NCAA's request for leave for Defendants to designate three (3) Lead Counsel, Defendants designate the following individuals as Lead Counsel: Mark Mester of Latham & Watkins for the NCAA; Matthew Kairis of Jones Day for the named member institutions; and Michael Olsen of Mayer Brown for the named conferences. Defendants further designate one (1) Liaison Counsel for Defendants, namely Johanna Spellman of Latham & Watkins.

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[2] To date, twelve (12) different NCAA member institutions and fourteen (14) different conferences have been named in the forty-six (46) proposed class actions that have been transferred to this Court by the Judicial Panel on Multidistrict Litigation. See Plaintiffs' Joint Status Report (Dkt. #62).

Dated: November 29, 2016

Respectfully submitted,

/s/ Mark S. Mester
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National Collegiate Athletic Association

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Dated: November 29, 2016

Respectfully submitted,

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Dated: November 29, 2016

Respectfully submitted,

/s/ Matthew A. Kairis
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Respectfully submitted,

/s/ Johanna M. Spellman
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CERTIFICATE OF SERVICE

I, Mark S. Mester, certify that on November 29, 2016, a true and correct copy of the forgoing DEFENDANTS' DESIGNATION OF THREE (3) LEAD COUNSEL AND ONE (1) LIAISON COUNSEL was filed through the CM/ECF system, which caused notice to be sent to all counsel of record.

/s/ Mark S. Mester

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